

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

SARA S. ECHEVARRIA,	)	
	)	
Plaintiff,	)	C.A. NO. 05-284 GMS
	)	
v.	)	
	)	
U-HAUL INTERNATIONAL, INC.,	)	TRIAL BY JURY OF
ROGER MAYFIELD, and	)	TWELVE DEMANDED
NATIONWIDE GENERAL INSURANCE	)	
COMPANY,	)	
	)	
Defendants.	)	

**DEFENDANT NATIONWIDE GENERAL INSURANCE COMPANY'S RESPONSE TO  
PLAINTIFF'S MOTION TO REMAND AND JOINDER IN REMOVAL PETITION**

Defendant, Nationwide General Insurance Company (hereinafter "Nationwide"), hereby responds to Plaintiff's Motion For Remand, and hereby joins in co-defendant U-Haul International, Inc.'s (hereinafter "U-Haul") Removal Petition, as follows:

1. On May 4, 2005, Nationwide gave written consent to the Removal by letter from Sonja Blackhawk to Monica Tynan, Esquire. See Exhibit "A" attached hereto. U-Haul subsequently filed the Removal Petition and accurately alleged that Nationwide had consented to the Removal. (D.I. No. 1).

2. Nationwide consented to the Removal Petition and hereby joins in the Removal of the case to this Court. Nationwide hereby adopts the argument made by U-Haul in it's Response to Plaintiff's Motion to Remand.

**WHEREFORE**, defendant Nationwide General Insurance Company respectfully requests the Court to deny Plaintiff's Motion for Remand.

***MORGAN SHELBY & LEONI***

*/s/ Robert J. Leoni*

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**DATE:** May 26, 2005